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9 UNITED STATES DISTRICT COURT
10 CENTRAL DISTRICT OF CALIFORNIA
11 SOUTHERN DIVISION

12 UNITED STATES OF AMERICA,
13 Plaintiff,
14 vs.
15 GLEN R. JUSTICE,
16 Defendant.

Case No. 8:10-CR-00080-CJC

**DEFENDANT GLEN R. JUSTICE'S
ADDENDUM TO STATEMENT OF
POSITION RE SENTENCING
FACTORS AND SENTENCING
MEMORANDUM**

Hearing Date: July 25, 2011
Hearing Time: 9:00 a.m.

18 TO PLAINTIFF UNITED STATES OF AMERICA AND ITS COUNSEL OF
19 RECORD: Defendant, Dr. Glen R. Justice, hereby submits this Addendum to
20 Statement of Position re Sentencing Factors and Sentencing Memorandum for
21 consideration by the Court at his sentencing.
22

Respectfully submitted:

23 Date: June 23, 2011

24 By: /s/ David W. Wiechert
David W. Wiechert
25 Jessica C. Munk
26 Attorneys for Defendant
27 Dr. Glen R. Justice
28



Lestonnac Free Medical Clinic

1215 E. Chapman Avenue, Orange, California 92866-2137
(714) 633-4600 (714) 633-3158 FAX (714) 633-1412

6/21/2011

Dear Honorable Judge Cormac Carney:

My name is Edward F. Gerber and I have been the Executive Director of the Lestonnac Free Clinic for the last six years. Our main facility is located in Orange, California and our satellite clinics exist in Los Alamitos, Stanton and Tustin, California. The Mission of the Lestonnac Free Clinic "is to meet the medical and dental needs of the poorest of the poor, regardless of race or religious beliefs, and who have nowhere else to turn." We are deeply committed to care for the medically indigent, uninsured, and all those who do not qualify under third party programs.

With no County Hospital, or public primary healthcare system, Orange County faces a critical shortage of affordable health services. Located in the heart of Orange County Lestonnac Free Clinic (a nonprofit organization) has a thirty-two year history of being a safety net provider offering free high quality health care services to low income and uninsured people thus directly increasing the efficiency of the local hospitals and institutions.

At Lestonnac Free Clinic we have volunteer Physicians and Dentists who generously donate their time to service our massive indigent population. Dr. Justice is our only Hematologist and Oncologist. He has been working for our cancer patients and establishing a comprehensive Oncology Program for the last nine months. Dr. Justice is a highly dedicated and clinically superb physician. His main commitment has been direct patient and cancer care to the less economically advantaged people in our society. Dr. Justice has previously established and been the medical director of two American Academy Of Surgeon accredited Cancer Center Programs in Orange County (Fountain Valley Regional Cancer Center and Orange Coast Memorial Cancer Center), and has worked hard to develop our program. He has been very active in bringing developments from the university to the community, and integrating clinical research and teaching into our Lestonnac Program. He is also committed to an excellent psychosocial program to support the emotional needs and fears of Oncology patients and their families and is also building a "zero tolerance" pain program.

Dr. Justice has become an asset to our clinic and provides services to our patients that are irreplaceable. At this time Dr. Justice donates three days a week and has done so for the last nine months, but if he is available in August 2011, we at Lestonnac would love to have him join us full-time in an expanded capacity. While I

"As you did it to one of the least of these my brethren, you did it to me."

(Matthew 25:40)

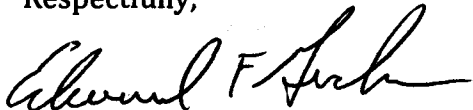


understand the position Dr. Justice is in, it would be a tremendous loss to our clinic and the community if he could no longer care for our patients. If he is able to work here full-time in August his main duties would be direct patient care, overseeing the development of a comprehensive cancer program, teaching our staff and overseeing the quality of care for the whole Lestonnac Medical System.

I know that Dr. Justice has been emotionally devastated by his crime, and feels great remorse, shame, pain and contrition, but serving others is his major way of making amends.

I have seldom witnessed a more caring and hard working physician. His ongoing commitment to Chernobyl-Kiev, Haiti and Rojo Gomez, Mexico reflects his compassion and deep need to serve others. Thank you for taking the time from your busy schedule to read this letter, but I felt you needed to know our feelings toward Dr. Justice, and how vital he is to us at Lestonnac and our community. Dr. Justice has been vital in caring for the poor and downtrodden in Orange County. For further information please do not hesitate to contact me.

Respectfully,

A handwritten signature in black ink, appearing to read "Edward F. Gerber". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Edward F. Gerber
Executive Director

CERTIFICATE OF SERVICE

I, Danielle Dragotta, declare

That I am a citizen of the United States and am a resident or employed in the county of Orange, California; that my business address is 115 Avenida Miramar, San Clemente, CA 92672; that I am over the age of 18 and not a party to the above-entitled action.

That I am employed by a member of the United States District Court for the Central District of California and at whose direction I served the foregoing document described as **DEFENDANT GLEN R. JUSTICE'S ADDENDUM TO STATEMENT OF POSITION RE SENTENCING FACTORS AND SENTENCING MEMORANDUM** on the interested parties as follows:

- ☐ **BY MAIL:** I caused such envelope(s) to be deposited in the mail at San Clemente, California with postage thereon fully prepaid to the office of the addressee(s) as indicated on the attached service list. I am "readily familiar" with this firm's practice of collection and processing correspondence for mailing. It is deposited with the U.S. Postal Service on that same day in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after the date of deposit for mailing in affidavit.
- ☒ **BY E-MAIL:** I caused a copy to be transmitted electronically by filing the foregoing with the clerk of the District Court using its ECF system, which electronically notifies counsel for that party.

Executed on June 23, 2011 at San Clemente, California.

S/Danielle Dragotta
Danielle Dragotta